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OTHERSON OF CIL. GAS & MINING

To: Holland Shepherd, Utah Div. of Oil, Gas, and Mining

From: Peter Sokolosky, Vernal District, BLM

Subject: Plans of Operation

The following is submitted for you information and input according to the existing Memorandum of Understanding. Attached is a copy of Chevron Chemical's, formerly Chevron Resources Co., proposal to modify a 1986 approved plan of operation (see attached map and Chevron proposal). The approved plan of operation covered Chevron's tailing dam and tailings pond expansion. The amendment, submitted on 1/31/90, calls for borrow material extraction from several areas (outlined and hatched in yellow). Chevron has applied for patent to some 28 mill sites. I am assigned to conduct a validity examination for the BLM in response to the patent application. During the progress of the field examination of the mill sites I noted that borrow activity had occurred on several of the mill sites already (see pink outlined area on map), an action not approved in the 1986 plan of operation. This is what lead Chevron to submit an amendment. After an initial review of this plan I found some shortcomings which Chevron is being asked to review and correct. I will be reviewing case law to see if the borrow extraction is in accordance with federal law. I will also be writing a very short supplement (to cover the modified action) to the environmental assessment (EA) which was done for the 1986 plan of operation.

Also attached is the draft EA, released for public review, covering the Doug Dykes mining plan of operation.

Please advise us if there are particular concerns of your Division with regards to the Chevron modification and the Dykes EA.

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attachments